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January 8, 2018

The Honorable Kimba M. Wood
Senior U.S. District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

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Re: *United States v. Joseph Meli, S1 17 Cr.*
127 (KMW)

Dear Judge Wood:

We represent Joseph Meli in the above-referenced matter. We write respectfully to request an adjournment of sentencing, which is presently scheduled for January 31, 2018. This is our first request for an adjournment of sentencing.

As you know, Mr. Meli appeared before the Honorable Barbara C. Moses, United States Magistrate Judge, on October 31, 2017, and entered a guilty plea to Count Five of the Superseding Indictment. Since that time, we have been working diligently to prepare for sentencing, including by gathering and providing records to the Probation Office to assist with the presentence investigation. Mr. Meli was interviewed by the Probation Office on November 21, 2017. We have recently received the initial disclosure of the Presentence Investigation Report and have been reviewing it carefully with Mr. Meli.

We need additional time, however, because we are still receiving numerous reference letters on Mr. Meli's behalf and are working on retaining an expert consultant to assist with certain aspects of our sentencing submission. Specifically, we are requesting an adjournment of approximately six weeks to make sure we have adequate time to incorporate these materials into a comprehensive sentencing submission for the Court. Earlier today, I spoke with Assistant U.S. Attorney Elisha Kobre, who confirmed that the Government does not object to this request.

Respectfully Submitted,


Daniel L. Stein

cc: AUSA Elisha Kobre
 AUSA Brendan F. Quigley
 Daniel J. Fetterman, Esq.